

EXHIBIT B

AKIN GUMP
STRAUSS HAUER & FELD LLP

Attorneys at Law

MATTHEW A. PEARSON
215.965.1258/fax: 215.965.1210
mpearson@akingump.com

April 13, 2010

David I. Gindler
Irell & Manella LLP
1800 Avenue of the Stars
Suite 900
Los Angeles, CA 90067

Re: Centocor Ortho Biotech, Inc. v. Genentech, Inc. and City of Hope
Case No. 08-cv-03573

Dear David:

During the deposition of Dr. Shmuel Cabilly on April 9, 2010, you asserted the attorney-client privilege and instructed Dr. Cabilly not to answer questions about the content of his communications with attorneys relating to documents that Dr. Cabilly had maintained in his personal files. As we understand it, you have withheld documents on this same subject matter based on an assertion of privilege.

To the extent any such communications could be considered privileged, the privilege was waived in 2007 when Dr. Cabilly testified about this precise subject matter, and again through Dr. Cabilly's testimony on April 9 about the content of his communications with Attorney Gordon Goldsmith relating to such documents.

Accordingly, please confirm by 12 PM EDT tomorrow that the defendants will, by the close of business on April 16, produce all documents relating to Dr. Cabilly's communications with attorneys about the contents of and/or the submission of documents in Dr. Cabilly's personal files, including but not limited to draft patent applications. If you do not agree to produce those documents, please let me know when you are available tomorrow, April 14, to meet and confer on the issue.

Regards,



Matthew A. Pearson

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Page 2

cc: Marc Sernel, Esq. (msernel@kirkland.com)
Daralyn J. Durie, Esq. (ddurie@durietangri.com)